

ORIGINAL

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SAM SLOAN,

Plaintiff,

-against-

HOAINHAN "PAUL" TRUONG, ZSUZSANNA "SUSAN" POLGAR,  
JOEL CHANNING, WILLIAM GOICHBERG, THE UNITED  
STATES CHESS FEDERATION, BILL HALL, HERBERT RODNEY  
VAUGHN, GREGORY ALEXANDER, FRANK NIRO, GRANT  
PERKS, WILLIAM BROCK, RANDALL HOUGH, RANDY BAUER,  
JERRY BERRY, TEXAS TECH UNIVERSITY AND UNITED  
STATES OF AMERICA,

Defendants.

**NOTICE OF MOTION  
TO ADMIT  
SCOT M. GRAYDON  
PRO HAC VICE**

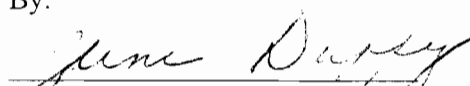
1:07-CV-08537-DC (FM)

PLEASE TAKE NOTICE that, upon the annexed affidavits of June Duffy, sworn to November 6, 2007 and Scot M. Graydon, sworn to November 2, 2007, and exhibits thereto, the undersigned will move this Court before the Honorable Denny Chin at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, at a day and time to be determined by the Court, for an order, pursuant to Rule 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, granting Scot M. Graydon, an Assistant Attorney General of Texas, *pro hac vice* admission to the Bar of this Court on behalf of Defendant Texas Tech University in this action..

Dated: New York, New York  
November 6, 2007

Respectfully submitted,

ANDREW M. CUOMO  
Attorney General of the State  
of New York  
By:

  
JUNE DUFFY  
Assistant Attorney General  
In Charge of Litigation  
Office & P.O. Address  
120 Broadway, 24<sup>th</sup> Floor  
New York, New York 10271  
(212) 416-8618

TO: SAM SLOAN  
1664 Davidson Avenue, Apt. 1B  
Bronx, New York 10452  
**PRO SE**

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2007 NOV 14 3:10 PM  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AFFIDAVIT OF SERVICE

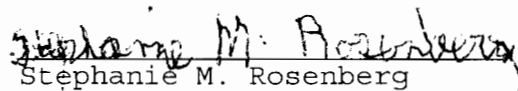
STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF NEW YORK    )

Stephanie M. Rosenberg, being duly sworn, deposes and says:

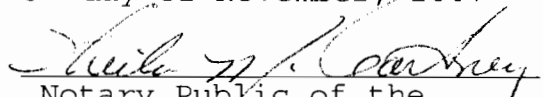
That she is a Managing Clerk in the office of ANDREW M. CUOMO, the Attorney General of the State of New York. On the 6<sup>th</sup> day of November, 2007, she served the annexed Notice of Motion, Affidavit of June Duffy, Affidavit of Scot M. Graydon and Proposed Order upon the following named person:

SAM SLOAN  
1664 Davidson Avenue, Apt. 1B  
Bronx, New York 10452

Plaintiff in the within entitled action by depositing a true and correct copy thereof, properly enclosed in a post-paid wrapper, in a post-office box regularly maintained by the United States Postal Service at 120 Broadway, New York, New York 10271 directed to said plaintiff at the address within the State designated by him for that purpose.

  
Stephanie M. Rosenberg

Sworn to before me this  
6<sup>th</sup> day of November, 2007

  
Notary Public of the  
State of New York

**SHEILA MCCARTHEY**  
Notary Public, State of New York  
No. 24-4640295

County of New York  
2/28/2010

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**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SAM SLOAN,

Plaintiff,

-against-

HOAINHAN "PAUL" TRUONG, ZSUZSANNA "SUSAN"  
POLGAR, JOEL CHANNING, WILLIAM GOICHBERG, THE  
UNITED STATES CHESS FEDERATION, BILL HALL, HERBERT  
RODNEY VAUGHN, GREGORY ALEXANDER, FRANK NIRO,  
GRANT PERKS, WILLIAM BROCK, RANDALL HOUGH,  
RANDY BAUER, JERRY BERRY, TEXAS TECH UNIVERSITY  
AND UNITED STATES OF AMERICA,

Defendants.

**AFFIDAVIT OF  
JUNE DUFFY  
IN SUPPORT OF  
MOTION**

1:07-CV-08537-DC  
(FM)

STATE OF NEW YORK )

: ss:

COUNTY OF NEW YORK )

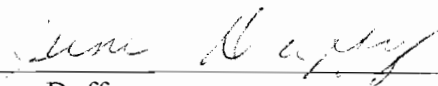
JUNE DUFFY, being duly sworn, deposes and says :

1. I am an Assistant Attorney General in charge of the Litigation Bureau in the Office of ANDREW M. CUOMO, the New York State Attorney General. I am a member in good standing of the Bar of the State of New York and admitted to practice Law in 1987. I am also admitted to the Bar of the United States District Court for the Southern District of New York. I make this affidavit in support of the motion pursuant to Rule 1.3 (c) of the Local Rules of this Court, for admission of Scot M. Graydon to this Court, *pro hac vice*, to represent Defendant Texas Tech University in this action.

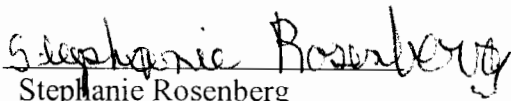
2. Mr. Graydon is an Assistant Attorney General of Texas and is a member in good standing of the Bar of the State of Texas. Mr. Graydon has represented to me that he is fully familiar with the Federal Rules of Civil Procedure and the Local Rules of this Court.

3. Accordingly, I respectfully request that Scot M. Graydon be admitted to the Bar of this Court, *pro hac vice* for the purpose of representing defendant Texas Tech University in this action. Attached is a proposed order granting the admission of Scot M. Graydon, *pro hac vice* to this Court.

Dated: New York, New York  
November 6, 2007

  
June Duffy

Sworn to before me this  
6 day of November, 2007

  
Stephanie Rosenberg  
Notary Public of the  
State of New York

STEPHANIE ROSENBERG  
Notary Public, State of New York  
No. 01RO4699796  
Qualified in Nassau County  
Certificate Filed in New York County  
Commission Expires July 18, 2012

ORIGINAL

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SAM SLOAN,

Plaintiff,

-against-

HOAINHAN "PAUL" TRUONG, ZSUZSANNA "SUSAN"  
POLGAR, JOEL CHANNING, WILLIAM GOICHBERG, THE  
UNITED STATES CHESS FEDERATION, BILL HALL, HERBERT  
RODNEY VAUGHN, GREGORY ALEXANDER, FRANK NIRO,  
GRANT PERKS, WILLIAM BROCK, RANDALL HOUGH, RANDY  
BAUER, JERRY BERRY, TEXAS TECH UNIVERSITY AND  
UNITED STATES OF AMERICA,

Defendants.

**AFFIDAVIT OF  
SCOT M.  
GRAYDON**

1:07-CV-08537-DC  
(FM)

STATE OF TEXAS           §  
                                  § ss:  
COUNTY OF TRAVIS     §

SCOT M. GRAYDON, being duly sworn, hereby deposes and says:

1. I am an Assistant Attorney General of Texas. I submit this affidavit in support of the Motion pursuant to Rule 1.3 (c) of the Local Civil Rules of the United States District Courts for the Southern and Eastern Districts of New York for an order admitting me, the undersigned, *pro hac vice* to the Bar of this Court to represent Defendant Texas Tech University in this action.

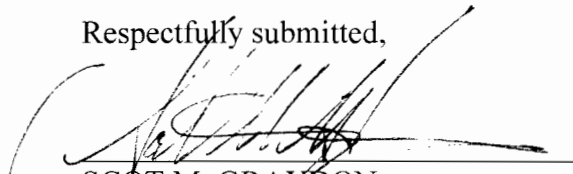
2. I am an attorney at law licensed to practice in the State of Texas and a member in good standing with the Bar of the State of Texas. I am also admitted to practice in the United States District Court for the Eastern District of Texas, the United States District Court for the Southern District of Texas, the United States District Court for the Western District of Texas, the United States District Court for the Northern District of Texas, the United States Court of Appeals for the Fifth Circuit, and the District of Columbia Court of Appeals. Attached hereto is a certificate in good standing for the State Bar of Texas.

3. There are no pending disciplinary proceedings against me in any State of Federal Court. I have read the rules of this court and will conduct myself in accordance with these rules.

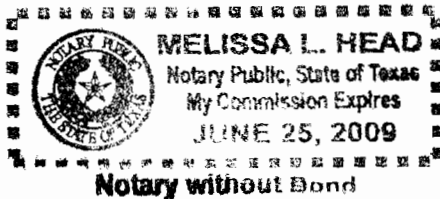
WHEREFORE it is respectfully requested that I be admitted *pro hac vice* to represent Defendant Texas Tech University in this action, be granted.

Dated: November 2, 2007  
Austin, Texas

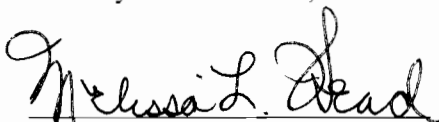
Respectfully submitted,



SCOT M. GRAYDON  
Texas Bar No. 24002175  
Assistant Attorney General  
General Litigation Division  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711-2548  
(512) 463-2120  
(512) 320-0667 FAX  
Scot.Graydon@oag.state.tx.us



Sworn to before me this  
2nd day of November, 2007

  
NOTARY PUBLIC  
of the State of Texas

# The Supreme Court of Texas

AUSTIN

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CLERK'S OFFICE

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I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

**SCOT MACDONALD GRAYDON**

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 7th day of November, 1997.

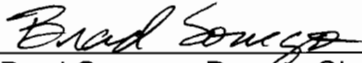
I further certify that the records of this office show that, as of this date

**SCOT MACDONALD GRAYDON**

is presently enrolled with the State Bar of Texas as an active member in good standing.

**IN TESTIMONY WHEREOF** witness my hand  
and the seal of the Supreme Court of  
Texas at the City of Austin, this 25th day  
of October, 2007.

BLAKE HAWTHORNE, Clerk

by   
Brad Sonogo, Deputy Clerk

No. 4782



**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SAM SLOAN,

Plaintiff,

-against-

HOAINHAN "PAUL" TRUONG, ZSUZSANNA "SUSAN"  
POLGAR, JOEL CHANNING, WILLIAM GOICHBERG, THE  
UNITED STATES CHESS FEDERATION, BILL HALL, HERBERT  
RODNEY VAUGHN, GREGORY ALEXANDER, FRANK NIRO,  
GRANT PERKS, WILLIAM BROCK, RANDALL HOUGH,  
RANDY BAUER, JERRY BERRY, TEXAS TECH UNIVERSITY  
AND UNITED STATES OF AMERICA,

Defendants

**ORDER ADMITTING  
SCOT M. GRAYDON  
PRO HAC VICE**

1:07-CV-08537-DC (FM)

Upon the motion of June Duffy, an Assistant Attorney General in the Office of the New York State Attorney General Andrew M. Cuomo, and the Affidavit of June Duffy, sworn to November 6, 2007, it is

ORDERED, that

SCOT M. GRAYDON  
Texas Bar No. 24002175  
Assistant Attorney General  
General Litigation Division  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711-2548  
(512) 463-2120  
(512) 320-0667 FAX  
Scot.Graydon@oag.state.tx.us

is admitted to practice *pro hac vice* in this action in the United States District Court for the Southern District of New York, subject to the payment of the filing fee.

Dated: New York, New York  
November , 2007

SO ORDERED

\_\_\_\_\_  
Denny Chin  
UNITED STATES DISTRICT JUDGE